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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Industrial Customers of Idaho Power

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE CONTINUATION)	
OF IDAHO POWER COMPANY'S A/C COOL)	CASE NO. IPC-E-13-14
CREDIT, IRRIGATION PEAK REWARDS,)	
AND FLEXPEAK DEMAND RESPONSE)	PETITION TO INTERVENE
PROGRAMS FOR 2014 AND BEYOND)	OF THE INDUSTRIAL CUSTOMERS
)	OF IDAHO POWER
)	

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as
"Intervenor," and pursuant to the Notice of Informal Prehearing Conference in this matter, and
pursuant to this Commission's Rule of Procedure, Rule 071, IDAPA 31.10.01074, hereby
petitions the Commission for leave to intervene herein and to appear and participate herein as a
party, and as grounds therefore states as follows:

The name and address of this Intervenor is:

Industrial Customers of Idaho Power
c/o Peter J. Richardson
Richardson & O'Leary
515 N. 27th Street
Boise, Idaho 83616
Telephone: (208) 938-7900
Fax: (208) 938-7904

This Intervenor will be represented herein by:

Peter J. Richardson, Esq.
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Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter J. Richardson as noted above and to:

Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703
(208) 342-1700
dreading@mindspring.com

This Intervenor, the Industrial Customers of Idaho Power, is an unincorporated association of large industrial consumers of electricity. All of the members of the Industrial Customers of Idaho Power receive electric utility services from the Applicant under Tariff Schedule 19. These industrial consumers claim a direct and substantial interest in this proceeding in that their ability to participate in the FlexPeak and/or other similar demand response programs for industrial customers of Idaho Power will be directly affected.

This Intervenor, in its capacity as a representative of industrial consumer's interests, intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding to determine the status of Idaho Power's demand response


programs as they impact the industrial class of customers, and this Intervenor would be unable to participate in proceedings which may have a material impact on its electric rates.

Although not required by this Commission's Rules, the multiple representation by this Intervenor of its members' interests will prevent duplication of effort and aid in the administration of these proceedings.

WHEREFORE, the Industrial Customers of Idaho Power request that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 6th day of June, 2013.

Richardson & O'Leary, LLP

By 
Peter J. Richardson
Attorney for the Industrial Customers
of Idaho Power

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of June, 2013, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE INDUSTRIAL CUSTOMERS OF IDAHO POWER, Case No. IPC-E-13-14, was served by electronic mail and U.S. Mail, postage prepaid, to:

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Nina Curtis
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